

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

WILLIAM HEMMINGS,

Plaintiff,

v.

INSYS THERAPEUTICS, INC.,
a Delaware corporation,

Defendant.

Case No. 18-cv-2036

Hon. Jorge L. Alonso

DEFENDANT INSYS THERAPEUTICS, INC.'S DISCOVERY PLAN

Insys Therapeutics, Inc. ("Insys"), pursuant to the Court's Notification of Docket Entry (D.E. 43), submits this Discovery Plan in advance of the Continued Status Hearing set for December 19, 2018. At this time, Insys intends to pursue the following written discovery and depositions during fact discovery in this case.

Written Discovery

Insys will serve additional written discovery to Plaintiff, including additional interrogatories and requests for production, as necessary and based upon Plaintiff's discovery responses to date and further information learned as discovery proceeds. Insys also will serve requests for admission to Plaintiff based upon Plaintiff's discovery responses and other information relevant to the case.

Depositions

Insys intends to take the following fact-witness depositions as set forth below.

Mid-February 2019:

Mr. William Hemmings (Chicago area)

Ms. Monica Sircar (same)

Mid-March 2019:

Kristen Pryor – Licensed Clinical Professional Counselor (West Dundee, IL)

Dr. Susan Lasher – Psychologist at Alexian Brothers Hospital (Elk Grove, IL)

Dr. Greta Negpal – Anesthesiologist – pain treatment (Chicago)

Early April 2019:

Charlene Nippa – Plaintiff's mother (Dallas)

Mid-April 2019:

William Hemmings III – Plaintiff's father (St Louis)

Marie Hemmings – Plaintiff's step-mother (St Louis)

INSYS THERAPEUTICS, INC.

By: /s/ Adam P. Schwartz

One of its attorneys

Adam P. Schwartz

David J. Walz

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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on the date shown below he caused Insys Therapeutics, Inc.'s Discovery Plan to be filed electronically with the court, which will cause a copy of the document and notification of the filing to be sent to all counsel of record.

Dated: December 17, 2018

/s/ Adam P. Schwartz
Attorney for Insys Therapeutics, Inc.